

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Frankie Page

Case No. 22-MJ-403

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 5, 2021 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section**Offense Description*

Title 18 U.S.C. Section 1951(a)

Hobbs Act Robbery

Title 18 U.S.C. Section 924(c)(1)(A)
(ii)

Carrying and Using a Firearm During and in Relation to a Crime of Violence

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet./s Andrew Allaire*Complainant's signature*Andrew Allaire, FBI*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/11/2022/s Marilyn Heffley*Judge's signature*City and state: Philadelphia, PAHon. Marilyn Heffley, U.S. Magistrate Judge*Printed name and title*

ATTACHMENT A - DESCRIPTION OF COUNTS

COUNT ONE

On or about December 5, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant FRANKIE PAGE, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant PAGE unlawfully took and obtained approximately \$500 United States Currency, belonging to Fila's Pizza, located at 1901 E. Washington Lane in Philadelphia, Pennsylvania, from an employee of that business, against his will, by means of actual or threatened force, violence, and fear of injury, immediate and future to his person and property, that is, by brandishing a firearm to threaten and control the victim employees of Fila's Pizza, and stealing money from Fila's Pizza, in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

On or about December 5, 2021, in Philadelphia, in the Eastern District of Pennsylvania, defendant FRANKIE PAGE, knowingly used and carried a firearm, that is, a Glock Model 23, .40 caliber semi-automatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Hobbs Act Robbery, in violation of 18 U.S.C. Section 1951(a), as charged in Count One of this complaint, and that firearm was brandished, in violation of Title 18, United States Code, Section 924(a)(1)(A)(ii).

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Andrew Allaire, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Philadelphia, Pennsylvania Division. I have been a Special Agent of the FBI for nearly five years. I am currently assigned to the Philadelphia Violent Crime squad and have been for approximately the past 4.5 years. Prior to joining the FBI, I was a Police Officer in the City of Biddeford, State of Maine, for approximately 6 years. In the course of my work, I have investigated violations of federal law being committed by violent offenders including robberies, carjackings, and firearms offenses.

2. I make this affidavit in support of a criminal complaint and arrest warrant charging Frankie PAGE (“PAGE”) with violations of 18 U.S.C. §§ 1951 (Hobbs Act Robbery) and 924(c) (carrying and using a firearm during and in relation to a crime of violence). This affidavit is based upon my personal knowledge, experience, and investigation, as well as information related to me directly or through reports of other FBI agents and task force officers, Philadelphia Police Department personnel, and other law enforcement officers in the course of their official duties. Throughout this affidavit, reference will be made to “agents,” referring to those federal, state and local law enforcement officers who have directly participated in the investigation, and with whom I have had regular contact.

3. Because this affidavit is submitted for the limited purpose of obtaining a criminal complaint, I have not included all information known by me or other agents concerning this investigation. I have set forth only those facts I believe are essential to establish probable cause

for the criminal complaint. This affidavit does not exhaust my knowledge or that of other agents of the facts and circumstances surrounding this investigation.

4. On December 5, 2021, at approximately 6:13 p.m., an unidentified black male (“UNSUB”) entered Fila’s Pizza, 1901 E. Washington Lane, Philadelphia, Pennsylvania. The UNSUB entered wearing a black coat, black pants, a mask, and white sneakers. He asked for a slice of pizza and handed the victim employee \$3. When the victim opened the register, the UNSUB reached over the counter and began removing money. When the victim tried to stop the UNSUB, the UNSUB removed a black handgun from his pocket and pointed it at the victim. The UNSUB stole approximately \$500 from the register and fled on foot.

5. The Philadelphia Police Real Time Crime Unit located a camera at Thouron Avenue and Washington Lane that recorded a male fitting the description enter an older model silver Chevy Impala. Real Time Crime relayed the information over the Philadelphia Police Department’s radio which allowed officers to stop the car at Chew Lane and Washington Lane, approximately 1.3 miles from Fila’s Pizza.

6. The car was identified as a 2011 Chevy Impala bearing PA registration LTC2431 and registered to PAGE, who was the sole occupant. PAGE matched the flash description of the male in the robbery. Both victims from Fila’s Pizza were transported to the scene and individually shown the male stopped. Both victims identified PAGE as the person that robbed Fila’s pizza using a firearm. Officers arrested PAGE and took him to the Northwest Detectives Division. When detectives searched the Impala, pursuant to a warrant, they found a Glock 23, .40 caliber pistol with an extended magazine in a hidden compartment. 21 rounds of

ammunition were loaded inside the magazine. Detectives attempted to take a statement from PAGE, but he refused.

7. PPD obtained video surveillance from Fila's Pizza which showed the robbery. Photos of the clothing worn by PAGE at the time of his arrest appear to be the same clothes pictured in the store video of the robbery suspect. For example, the video shows that the suspect was wearing black pants with a blue label on the left pant leg, which matches a blue "NB" label on the left pant leg of the clothing PAGE was wearing. The jacket and distinctive white sneakers seen in the video also appear to be identical to the clothing PAGE was wearing.

8. Based on the above, I believe that probable cause exists that on December 5, 2021, in the Eastern District of Pennsylvania, Frankie PAGE committed violations of 18 U.S.C. §§ 1951 (Hobbs act robbery) and 924(c) (carrying and using a firearm during and in relation to a crime of violence).

Respectfully submitted,

/s/ Andrew Allaire
Andrew Allaire
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on March 11, 2022

/s Marilyn Heffley
Honorable Marilyn Heffley
United States Magistrate Judge